

# EXHIBIT D

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CITY OF ANAHEIM, JORGE CISNEROS,

PAUL DELGADO, BRETT HEITMAN,

KENNETH WEBER, and CATALIN PANOV

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ANTONIO LOPEZ, individually;  
JOHANNA LOPEZ, individually;  
M.R., by and through his guardian ad  
litem, April Rodriguez, individually and  
as successor in interest to Brandon  
Lopez; B.L. and J.L., by and through  
their guardian ad litem Rachel Perez,  
individually and as successor in interest  
to Brandon Lopez; S.L., by and through  
his guardian ad litem, Rocio Flores,  
individually and as successor in interest  
to Brandon Lopez,

Plaintiffs,

vs.

CITY OF ANAHEIM; CITY OF  
SANTA ANA; DAVID VALENTIN;  
JORGE CISNEROS; PAUL  
DELGADO; BRETT HEITMAN;  
KENNETH WEBER; CAITLIN  
PANOV; DOES 1-10,

Defendants.

Case No. 8:22-cv-1351

**DEFENDANT CITY OF  
ANAHEIM'S SUPPLEMENTAL  
DISCLOSURE PURSUANT TO  
FEDERAL RULE OF CIVIL  
PROCEDURE 26(A)(1)**

Trial Date: Not Set

Defendant CITY OF ANAHEIM, JORGE CISNEROS; PAUL DELGADO;

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**DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 26(A)(1)**

BRETT HITMAN; KENNETH WEBER; and CAITLIN PANOVA hereby provide these **supplemental disclosures** as required pursuant to Federal Rule of Civil Procedure 26(a)(1).

**1. POTENTIAL WITNESSES.**

Defendants are informed and believe that the following list represents the last known names, addresses, and telephone numbers of individuals likely to have discoverable information relevant to the disputed facts alleged with particularity in the pleadings and identifying the subjects of the information, to the extent known to defendants at present. Upon information and belief, there may be other witnesses identified in the pending criminal investigation by the California Department of Justice and, thus, such identities, if any, are not currently in possession of Defendants and will be supplemented at time the investigation is complete. Defendants reserve the right to amend and/or supplement these disclosures as discovery is ongoing.

NO	NAME	ADDRESS	TELEPHONE	SUBJECT OF KNOWLEDGE
1.	<b>Lopez, Antonio</b>	Through Counsel	Through Counsel	$\pi$
2.	<b>Lopez, Johanna</b>	Through Counsel	Through Counsel	$\pi$
3.	<b>Lopez, B.</b>	Through Counsel	Through Counsel	Minor $\pi$
4.	<b>Lopez, J.</b>	Through Counsel	Through Counsel	Minor $\pi$
5.	<b>Lopez, S.</b>	Through Counsel	Through Counsel	Minor $\pi$
6.	<b>Flores, Rocio</b>	Through Counsel	Through Counsel	$\pi$
7.	<b>Perez, Rachel</b>	Through Counsel	Through Counsel	Guardian Ad Litem
8.	<b>Rodriguez, April</b>	Through Counsel	Through Counsel	$\pi$

NOTE: All witnesses herein above and marked with an asterisk (\*) are

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**DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)**

believed to be currently employed by Defendant County of Riverside, and thus should be contacted only through the defendant's counsel of record in this action. See, Cal. R. Prof. Conduct 2-100.

## 2. DOCUMENTS AND RECORDS.

<u>NO</u>	<u>ITEMS 1-46 PREVIOUSLY DISCLOSED WITH DEFENDANTS' RRF</u>
1.	APD Report, Stolen Vehicle-OIS, Compiled, 09/28/21 <b>COA 000001-12</b>
2.	OC Crime Lab, Vehicle Examination by OC Crime Lab Doretti, B., 01/14/22 <b>COA 000013</b>
3.	OC Crime Lab, Vehicle Examination by OC Crime Lab Ramirez, M., 11/24/21 <b>COA 000014</b>
4.	OC Coroner, Autopsy (1), Lopez, B. by Kim, Yong-son, 09/30/21 <b>COA 000015-34</b>
5.	OC Coroner, Autopsy Photographs by OC Crime Lab Flores, S., 09/30/21 <b>COA 000035-52</b>
6.	OC Crime Lab, Coroner re Lopez by Yong-son, K., 09/30/21 <b>COA 000053</b>
7.	OC Crime Lab, Embalming Photographs by OC Crime Lab Espenosa, S., 10/03/21 <b>COA 000054</b>
8.	OC Fire, EMS by OC Fire re OIS by Compton, M., 09/30/21 <b>COA 000055-61</b>
9.	OC Crime Lab, Evidence Collection at Autopsy by OC Crime Lab Zoccoli, J., 11/13/21 <b>COA 000062</b>
10.	OC Crime Lab, Scene of OIS by OC Crime Lab Leon, K., 09/28/21 <b>COA 000063-64</b>
11.	OC Crime Lab, Scene of OIS by OC Crime Lab Ramirez, M., 03/04/22 <b>COA 000065-68</b>

1	12.	OC Crime Lab, Scene of OIS by OC Crime Lab Walker, S., 02/16/22
2		<b>COA 000069-72</b>
3	13.	OC Crime Lab, Tox re Lopez by F.S. Havro, 12/01/21
4		<b>COA 000073</b>
5	14.	OC Crime Lab, Officer Processing by OC Crime Lab Peplowski, H., 10/18/21
6		<b>COA 000074-75</b>
7	15.	APD CAD Call Hardcopy re OIS Follow-Up Investigation, 09/28/21
8		<b>COA 000076-144</b>
9	16.	APD CAD Call Hardcopy re OIS, 09/28/21
10		<b>COA 000145 -173</b>
11	17.	Cell Phone, Collision with Bystander Vehicles, 09/28/21
12		<b>COA 000174</b>
13	18.	Critical Incident Community Briefing Video, 11/12/21
14		<b>COA 000175</b>
15	19.	OCSD Booking Photo of Lopez, 02/07/21
16		<b>COA 000176</b>
17	20.	OCSD Photos, Additional Scene, 09/29/21
18		<b>COA 000177-293</b>
19	21.	OCSD Photos, Analyst Casework
20		<b>COA 000294-383</b>
21	22.	OC Crime Lab Photos, Autopsy, 09/30/21
22		<b>COA 000384-577</b>
23	23.	OC Crime Lab Photos, CSI Crime Scene, 09/28/21
24		<b>COA 000578-645</b>
25	24.	OC Crime Lab Photos, Scene, 09/29/21
26		<b>COA 000646-721</b>
27	25.	APD, Policy Manual, 09/22/21
28		<b>COA 000722-780</b>
	26.	OC Chiefs' of Police & Sheriff's Association Protocol Policy, Governing Inter City SWAT Operations #110

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DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)

1		<b>COA 000781-784</b>
2	27.	APD Records, Training re Delgado, P., 12/32/21
3		<b>COA 000785-793</b>
4	28.	APD Records, Training re Heitmann, B., 11/20/21
5		<b>COA 000794-799</b>
6	29.	APD Records, Training re Panov, C., 12/31/21
7		<b>COA 000800-806</b>
8	30.	APD Records, Training re Weber, K., 11/19/21
9		<b>COA 000807-813</b>
10	31.	Driver's License, Lopez, B., 02/17/15
11		<b>COA 000814</b>
12	32.	Docket, Criminal Case, Warrant, 02/09/21
13		<b>COA 000815-822</b>
14	33.	Docket, Criminal Case, Warrant, 02/04/20
15		<b>COA 000823-828</b>
16	34.	APD Report, Prior re Armed Robbery-Business, Compiled, 01/29/21
17		<b>COA 000829-908</b>
18	35.	FDP Report, Prior re Assault-Battery, Compiled, 07/19/14
19		<b>COA 000909-923</b>
20	36.	APD Report, Prior re Domestic Violence, Compiled, 02/01/20
21		<b>COA 000924-953</b>
22	37.	APD Report, Prior re Robbery, Compiled, 01/14/21
23		<b>COA 000954-967</b>
24	38.	FPD Report, Prior re Robbery-Handgun, Compiled, 01/21/21
25		<b>COA 000968-991</b>
26	39.	APD Report, Prior re Robbery-Handgun, Compiled, 01/27/21
27		<b>COA 000992-1010</b>
28	40.	APD Report, Prior re Robbery-Handgun, Compiled, 01/29/21
		<b>COA 001011-1087</b>
	41.	APD Arrest Warrant, Prior Incident, Declaration by Inv. Celello, 02/09/21
		<b>COA 001088</b>

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42.	APD OIS & In Custody Death Investigation Online Links <b>COA 001089 -1094</b>
43.	APD UOF Memo re 10 Year Review of UOF Cases with Reprimands and Terminations by Lt. Starke, B., 12/07/2022 <b>COA 001095-1196</b>
44.	BWC re OIS by Delgado, 09/28/21 <b>COA 001097</b>
45.	BWC re OIS by Panov, C., 09/29/21 <b>COA 001098</b>
46.	BWC re OIS by Weber. 09/29/21 <b>COA 001099</b>
***	<b>NEWLY DISCLOSED ITEMS START AT 47</b>
47.	Video BWC from Officer Patrick Bradley; 09/28/2021 <b>COA 001100</b>
48.	Video BWC from Officer Lorenzo Uribe; 09/28/2021 <b>COA 001101</b>

In addition, Defendant identifies the following categories of documents that may exist relevant to this matter. Defendant reserves the right to amend and/or supplement these disclosures as discovery is ongoing.

1. All reports prepared by peace officers and public safety personnel who may have been involved with the incident alleged in the operative Complaint.
2. All reports prepared by law enforcement personnel and public safety personnel who may have investigated the incident alleged in the operative Complaint.
3. All medical records of any plaintiff, decedent, or individual involved in the underlying incident.
4. All pleadings filed in this matter.
5. All answers/responses to interrogatories, requests for production of documents, and requests for admission in this matter, including all amendments

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**DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)**

1 and/or supplements thereto, and including any and all documents attached thereto.

2 6. All transcripts and recordings of depositions and any document marked  
3 as an exhibit to a deposition.

4 7. Reports of all parties' experts and all supporting documentation, date,  
5 video presentations, learned treatises, publications, studies, etc.

6 8. Enlargements of graphs, photographs or other exhibits.

7 9. All exhibits identified through future discovery including any items  
8 produced pursuant to a protective order in this matter.

9 10. Documents and materials identified in the Rule 26 disclosure  
10 statements of the other parties in this case.

11 **3. COMPUTATION OF DAMAGES TO DISCLOSING PARTY.**

12 At present, the Rule 26 requirement to disclose the computation of any  
13 category of damages claimed to the disclosing party does not apply to the  
14 defendants.

15 **4. INSURANCE.**

16 Defendant County is insured up to a certain point per California Government  
17 Code § 990.

18 **5. ONGOING DISCOVERY.**

19 Investigation and discovery by the defendants is continuing and is not yet  
20 complete. Defendants reserve the right to refer to, conduct discovery with reference  
21 to, or offer into evidence at trial any and all witnesses, facts, and evidence,  
22 notwithstanding the absence of a reference to such witnesses, evidence, or facts  
23 within these or any disclosures.

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1 All disclosures herein are to the best knowledge, information, and belief  
2 formed after reasonable inquiry by defendants, and the defendants are informed and  
3 believe that these disclosures are complete and correct as of the time made or  
4 supplemented.

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6 DATED: January 17, 2024

LEWIS BRISBOIS BISGAARD & SMITH LLP

7  
8 By: Tori L.N. Bakken  
9 TONY M. SAIN  
10 TORI L.N. BAKKEN  
11 Attorneys for DEFENDANTS CITY OF  
12 ANAHEIM, et al.  
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**FEDERAL COURT PROOF OF SERVICE**  
LOPEZ, ANTONIO, et al. v. CITY OF ANAHEIM, et al.  
Case No. 8:22-cv-1351

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 633 West 5th Street, Suite 4000, Los Angeles, CA 90071. I am employed in the office of a member of the bar of this Court at whose direction the service was made.

On January 17, 2024, I served the following document(s): DEFENDANT CITY OF ANAHEIM'S SUPPLEMENTAL DISCLOSURE PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(A)(1)

I served the documents on the following persons at the following addresses (including fax numbers and e-mail addresses, if applicable):

Dale K. Galipo, Esq.  
Renee V. Masongsong, Esq.  
LAW OFFICES OF DALE K. GALIPO  
21800 Burbank Boulevard, Suite 310  
Woodland Hills, CA 91367  
Tel: (818) 347-3333  
Fax: (818) 347-4118  
[dalekgalipo@yahoo.com](mailto:dalekgalipo@yahoo.com)  
[rvalentine@galipolaw.com](mailto:rvalentine@galipolaw.com)

**ATTORNEYS FOR PLAINTIFFS:**  
**B.L., J.L., and M.R.**

The documents were served by the following means:

☒ (BY E-MAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the e-mail addresses listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America and the State of California that the foregoing is true and correct.

Executed on January 17, 2024, at Los Angeles, California.

/s/ *Curfew F. Wilson*  
\_\_\_\_\_  
Curfew F. Wilson